

**FILED**

February 24, 2023

Clerk, U.S. Bankruptcy Court

IT IS ORDERED AND NOTICE IS GIVEN that unless within 23 days of the date in the FILED stamp above an interested party: (1) files a written objection to the motion below, setting forth the specific grounds for the objection, with the clerk at 1050 SW 6th Ave. #700, Portland OR 97204 or 405 E 8th Ave. #2600, Eugene OR 97401, and (2) serves the objection on the trustee and any attorney for the trustee at the service address(es) below, the trustee will thereafter settle and compromise the matter upon the terms below and the settlement will be deemed approved without further order.



DAVID W. HERCHER  
U.S. Bankruptcy Judge

## UNITED STATES BANKRUPTCY COURT

## DISTRICT OF OREGON

In re	)	
	)	
	)	
	)	
Debtor(s)	)	Case No. _____
	)	
	)	Adv. Proc. No. _____
	)	
	)	Adv. Proc. No. _____
	)	
	)	Adv. Proc. No. _____
	)	
	)	MOTION AND NOTICE OF INTENT
	)	TO SETTLE AND COMPROMISE
	)	ADVERSARY PROCEEDINGS,
	)	<b>AND ORDER THEREON</b>
	)	
	)	<u>AND NOTICE OF INTENT TO COMPENSATE</u>
	)	<u>CHAPTER 11 PROFESSIONALS</u>

The undersigned trustee, \_\_\_\_\_, moves to settle and compromise the above adversary proceeding upon the following terms:

###

DATE: \_\_\_\_\_

\_\_\_\_\_  
Trustee

Service Address: \_\_\_\_\_

Name of Attorney for Trustee: \_\_\_\_\_

Service Address: \_\_\_\_\_

*In re Consolidated Estate of Wall to Wall Tile & Stone Entities*  
U.S. Bankruptcy Court for the District of Oregon, Case No. 19-32600-dwh7

**CH. 7 TRUSTEE'S PROPOSED GLOBAL SETTLEMENT RE: BAFFCO**

**EXHIBIT A: Proposed Compensation of Ch. 11 Professionals**

The chapter 11 professionals in the Debtors' case, along with the United States Trustee ("UST"), have filed final fee applications with the Bankruptcy Court.

As a condition of the proposed settlement, all of the following claims are to be allowed in full:

<b>Ch. 11 Professional Compensation Claimant Name</b>	<b>Amount of Claim</b>	<b>Proof of Claim #</b>
Tonkon Torp LLP	\$ 242,403.87	POC 95
Edward Hostmann Inc. (now known as AJET Inc.)	\$ 78,174.63	POC 69
Bennington & Moshofsky, P.C.	\$ 52,078.25	POC 87
HB Morris Financial Services LLC	\$ 19,171.25	POC 77
Leonard Law Group LLC	\$ 39,268.91	POC 84
Pachulski Stang Ziehl & Jones LLP	\$ 95,037.63	POC 83
Arch & Beam Global LLC	\$ 26,634.70	POC 82
U.S. Trustee	\$ 36,481.80	POC 79

Copies of the above-referenced claims may be obtained from the Bankruptcy Court.

**YOU ARE NOTIFIED** that unless you file an objection to any of the proposed compensation claims based on the directions and deadline set forth in this settlement notice/order, in which you set forth the specific grounds for such objection and your relation to the case, the Trustee will present an order to the Court allowing the requested fees as chapter 11 administrative expense (other than as to the claim of the U.S. Trustee, which does not require approval of the Court).